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February 21, 2024

Honorable Lee G. Dunst
United States Magistrate Judge
United States District Court
Eastern District of New York
100 Federal Plaza, Courtroom 830
Central Islip, New York 11722

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Re: *Myers v. County of Nassau et al.*, No. 2:22-CV-07023-OEM-LGD

Dear Judge Dunst:

Pursuant to the Court's Order dated February 6, 2024, the parties to the above-captioned action conferred and write jointly to respectfully propose the following schedule for the remaining fact discovery, expert discovery, commencement of dispositive motion practice, and filing of a proposed joint pretrial order.

- Fact discovery completed by December 2, 2024.
- Exchange of initial expert reports completed by February 3, 2025.
- Exchange of all expert reports completed by March 28, 2025.
- Completion of expert discovery completed by June 10, 2025.
- Submission of joint certification of completion of all discovery completed by June 30, 2025.
- Commencement of dispositive motion practice completed by July 20, 2025.
- Filing of proposed joint pretrial order: 45 days following rulings on dispositive motions.

Respectfully submitted,

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